Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-1 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why certain "Connect Typical Occur'nce" factors in the VMA_Whsl_NRC_Wkpp exceed 100%.

REPLY: The Verizon MA NRC model recognizes the need for more than one person to perform an activity by using a typical occurrence factor greater than 100%.

In Tabs 72 – 75, the "Connect Typical Occurrence" factors exceed 100% because the work operations for performing these splicing functions in underground cable require two men. Where two technicians are involved, the occurrence factor is expressed as 200%

VZ # 530

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-2 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why, in certain instances, the "Connect Forward Looking Adjustment" exceeds the "Connect Typical Occur'nce."

REPLY: As explained in Mr. Meacham's pre-filed Direct testimony pages 11,12 and 27, the typical occurrence factor represents the percentage of time an activity is performed in the provisioning of a particular UNE/service. The typical occurrence factor is applied to the average studied activity work times.

All of the adjustments can be found in the non-recurring cost model. A forward-looking Adjustment factor is used in the model to adjust for the frequency in which a given activity will be performed in the future by applying it to the product of the average activity work time and the typical occurrence factor. i.e., if on average a particular activity takes 10 minutes to perform but is only performed 50% of the time currently (50% typical occurrence) then the amount of current time in the study is 50% of 10 min. or 5 minutes. If forward looking improvements are expected to further reduce the need for performing the activity by, for instance, 25%, then while the absolute value of a forward looking factor of 75% (1-25%) exceeds the 50% typical occurrence factor its application (75% of the 5 minutes) further reduces the time included in the model to 3.75 minute. Forward looking factors can range from 0% to 100%, where 0% would indicate the activity would no longer be necessary and 100% would indicate that no improvements are expected beyond the current conditions.

In Tabs 68 – 71 for activities 9 and 10 the "Connect Forward Looking Adjustment exceeds the "Connect Typical Occurrence" because for those occurrences, the future requirement is not anticipated to change.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-6 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why the task "[u]pon arrival at job site, set up work area protection" takes (for example) 17.57 minutes if 1 Bridged Tap is being removed and 43.93 minutes if multiple Bridged Taps are being removed.

REPLY: Activities for loop conditioning assume work times associated with removal of one or more devices on the same loop. Multiple bridged tap removal requires a set-up at each loop location where these devices are removed. For study purposes, an average of two and one half of these devices are assumed when multiple bridged taps need to be removed from the same loop. The time of 43.93 minutes is simply 17.57 minutes multiplied by 2.5 occasions.

VZ # 535

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-8 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why the task "[i]dentify and open the splice case" takes (for example) 26.46 minutes if 1 Bridged Tap is being removed and 66.14 minutes if multiple Bridged Taps are being removed.

REPLY: Activities for loop conditioning assume work times associated with removal of one or more devices on the same loop. Multiple bridged tap removal requires work be performed at each loop location where these devices are removed. For study purposes, an average of two and one half of these devices are assumed when multiple bridged taps need to be removed from the same loop. The time of 66.14 minutes is simply 26.46 minutes multiplied by 2.5 occasions.

VZ # 537

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-9 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why the task "Close splice case" takes (for example) 26.45 minutes if 1 Bridged Tap is being removed and 66.12 minutes if multiple Bridged Taps are being removed.

REPLY: Activities for loop conditioning assume work times associated with removal of one or more devices on the same loop. Multiple bridged tap removal requires work be performed at each loop location where these devices are removed. For study purposes, an average of two and one half of these devices are assumed when multiple bridged taps need to be removed from the same loop. The time of 66.12 minutes is simply 26.45 minutes multiplied by 2.5 occasions.

VZ # 538

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-11 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why the task "[i]f site is aerial, set up bucket truck and/or ladder and platform" takes (for example) 18.34 minutes if 1 Bridged Tap is being removed and 45.84 minutes if multiple Bridged Taps are being removed.

REPLY: Activities for loop conditioning assume work times associated with removal of one or more devices on the same loop. Multiple bridged tap removal requires work be performed at each loop location where these devices are removed. For study purposes, an average of two and one half of these devices are assumed when multiple bridged taps need to be removed from the same loop. The time of 45.84 minutes is simply 18.34 minutes multiplied by 2.5 occasions.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Spacialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-12 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. When multiple loops are assumed, to be conditioned, what is the number of loops assumed in the cost model? Why was that number assumed? Please provide any and all support for that assumption.

REPLY: Verizon MA's non recurring cost model assumes only one loop conditioned at a time. Any reference to multiples assumes multiple devices on the same loop.

VZ # 541

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce Meacham
Title: Senior Specialist

REQUEST: CLEC Coalition, Set #9

DATED: June 22, 2001

ITEM: CC 9-13 Refer to Tabs 68 – 75 of the VMA_Whsl_NRC_Wkpp. Please explain why, in certain instances, the "Connect Forward Looking Adjustment" exceeds the "Connect Typical Occur'nce."

REPLY: Please see Verizon MA's response to Information Request CC 9-2.

VZ # 542

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director – Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-1 Please provide the electronic files supporting the schedules provided in response to AT&T 4-24 and AT&T 14-19.

REPLY: All electronic files associated with the New York Filing are available from the following Company web site:

http://www.bellatlantic.com/regulatory/ny/

VZ # 562

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-2 Please explain why Verizon was unable to calculate a FLC factor using Massachusetts-specific data. How did Verizon conclude that an 80% FLC factor was reasonable for Massachusetts based on New York data?

REPLY: State-specific FLC factors can only be determined after the TELRIC investments associated with UNEs have been identified in a given state. For the initial filing, the UNE studies are necessarily being completed after development of the relevant factors. It is thus a timing issue that the FLC factor used in Massachusetts could not be determined initially on the basis of the UNE TELRIC studies being filed at the same time. At the time of compliance, a Massachusetts-specific determination can be made.

Based on the previous UNE cases, the relationship of TELRIC to Total Expenses for Massachusetts was nearly the same as the relationship in New York. As a result, the Company concluded that an 80% FLC factor was reasonable for Massachusetts based on New York data. In fact, the 80% value is conservative, since the data is numerically closer to 75% than to 80%.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-3 In the cost studies supporting Verizon's proposed UNE rates, is it Verizon's position that the investment amounts used to determine TELRIC expenses through the use of annual charge factors are approximately 80% of Verizon's current booked investment? If so, please provide specific examples comparing forward-looking investment to current booked investment. If not, please explain why Verizon's FLC example on page 60 of its Initial
Panel testimony assumes that TELRIC investment will be significantly less than current investment.

REPLY: Yes. Please see Verizon MA's response to Information Request ATT 14-19.

VZ # 564

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-5 In reference to Verizon's response to CLEC Coalition 2-56, please explain why a FLC factor was not needed to calculate its annual charge factors for UNE prices set in 1997 when telecommunications equipment prices were expected to decline over the next 3-5 years at that time?

REPLY: As previously explained, a FLC factor is needed when adjustments are made to the level of expenses reflected in the numerator to make them forward-looking, but similar adjustments have not been made in the denominator, when calculating an annual cost factor. Such a mismatch needs to be corrected so that the application of an ACF to a forward-looking investment yields the identified level of forward-looking expenses.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-6 Please explain in detail how the various inflation and productivity indices were derived on the "Inflation Indices" tab within the VCost Excel file provided in response to CLEC Coalition 1-6. Also, identify which of the indices represents the productivity factor. If the information provided in response to CLEC Coalition 1-16 is part of Verizon's answer, please explain how to trace the information provided in that response into the aforementioned VCost Excel file tab.

REPLY: The TPI, LCI, and Productivity Factors were provided in the Attachment (Proprietary) to CC 1-16. The numbers can be traced from the provided Excel Spreadsheet to that source using the following example: Buildings Account #2121 - Open sheet entitled "Bldgunit Dir Exp". Examine line C-14. The reference, on the right, says to look at the sheet entitled "Inflation Indices", lines 16 and 19. Open that sheet. The value for line 16 is "3.79". This number can be found on the Attachment (Proprietary) to CC1-16 on the sheet entitled "Labor Infl Factor" cell "K8". Likewise, the data in line 19, which is "–2.73" can be found on the attachment on sheet "2,000 LBR Prod" in cell "M39". The manner of applying these factors is explained in the same reference column of the previously mentioned excel file, in the "Bldgunit Dir Exp" sheet, on line C14.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J, Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-7 In reference to Verizon's response to CLEC Coalition 7-3, please provide all expected savings from the GTE merger that were included within the productivity factor. If the information provided in response to CLEC Coalition 1-16 is part of Verizon's answer, please explain how the GTE merger savings would be implicit in the productivity factor if the Labor Cost Index was prepared back in 1997 based on actual data from 1995 and 1996. Also, explain why Verizon did not calculate a separate "Wholesale Merger Savings Loading Factor" as it did in the New York TELRIC case.

REPLY: Productivity factors represent the effect of numerous factors: technology improvements, process and operational improvements, mergers, etc. Thus savings from the GTE merger were just one means by which some of the anticipated productivity improvements were to be attained. When projections are made for productivity improvements, it is impossible to know specifically what technology changes, operational improvements or merger activity may come to fruition several years away, but their likely existence are still considered.

Because productivity, as discussed, reflects the impact of many factors, the merger savings were adequately acknowledged and an additional separate factor was unneeded.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-8 Regarding Verizon's response to CLEC Coalition 7-1, the CLEC Coalition seeks information similar to that provided by Verizon in response to CC-BA-35, attached hereto as Exhibit 1 to CLEC Coalition 10-8, in the New York TELRIC proceeding, Case No. 98-C-1357. While CC-BC ratios may or may not be part of the determination of investment loading factors, these ratios and the supporting telephone plant indices provide relevant information on the age and cost of Verizon's historical plant-in-service compared to replacement cost.

REPLY: Verizon MA objects to this request on the ground that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. While it is true that CC-BC ratios provide information on the age and cost of Verizon's historical plant-in-service compared to replacement cost, neither historical plant in service nor the replacement of such plant form the basis of the forward-looking TELRIC investments underlying the UNE studies at issue in this proceeding.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Al Sovereign
Title: Group Manager-Capital Recovery

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-9 In reference to Verizon's response to CC 1-14, is any of Verizon's current plant-in-service beyond the economic lives it proposes for depreciation in this case? Please provide all schedules and studies supporting Verizon's answer.

REPLY: Verizon MA objects to this request on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Verizon's historical plant-in-service does not form the basis of the forward-looking TELRIC investments underlying the UNE studies at issue in this proceeding. As a result, the age and life of such plant is irrelevant to this proceeding, nor are they dispositive in any way of the correct economic lives for the forward-looking investments used to provide UNEs.

VZ # 570

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-10 Please describe how the LCAM model was developed. Did VZ-MA first develop the LCAM model on Excel and then subsequently used the Oracle software to build an user interface? Please explain and detail the chronology of the model's development.

REPLY: The initial model was developed for the former Bell Atlantic South from the Bellcore (Telcordia) UAAA program (a compiled program), the RTCAP model (an Excel spreadsheet), and the LCAM model (a Lotus 1-2-3 spreadsheet). The Oracle database was used to organize the input files in the Btrieve database used by UAAA, the Access database inputs to RTCAP, and the UAAA results and other wire center-level information input to LCAM. The initial formulas and Visual Basic user interfaces were developed simultaneously by the programmers. There are no Excel spreadsheets involved in the methodology.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-11 In LCAM, as provided by VZ-MA, is it possible to access the Excel spreadsheets outside the Oracle software (i.e., without using the Oracle software)? If yes, please explain.

REPLY: No. There are no Excel spreadsheets.

VZ # 572

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10
DATED: June 25, 2001

ITEM: CC 10-12 Please explain whether and how the "auditing" function, allowed in Excel under "Tools", can be applied in LCAM, as the model is provided to the CLEC Coalition in this proceeding. The auditing function in Excel allows to *visually* inspect all trace precedents and trace dependents; i.e., the software draws a web of arrows between connected cells. Does the Oracle software allow for the same kind of auditing? If so, please explain.

REPLY: There is no "auditing" function available.

In the Loop Study module, the user may view the results of each formula for a single wire center. To do so, load the study, press "Edit" from the main user interface, select the Formulas tab, then press "Select Data" at the bottom of the screen. Choose a CLLI code from the drop down list and press "OK". The results of each formula will appear in the "Review" column.

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-13 In the LCAM, please explain if it is possible to change the location of the Feeder Distribution Interface. And if so, please explain how this is done.

REPLY: The Feeder Distribution Interface is located at the end of the Feeder and Subfeeder and the beginning of the Distribution. It cannot be relocated in this model.

VZ # 574

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-14 Please explain how in LCAM one would change the length of the distribution links per distribution area.

REPLY: The distribution length is calculated in the Plant Characteristics formula "AVG_DIST_LGTH". A new formula could be substituted here.

VZ # 575

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-15 Please explain how in LCAM one would change the concentration ratio on GR303.

REPLY: The concentration ratio on GR303 can be changed in the Electronics module by changing the factor "CONC_GR303" and the "CO_PLUG_INV" column on rows 1, 6 and 8 in the matrix input table "COT_INV".

VZ # 576

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-16 Please provide a detailed description of how LCAM determines the probability of selecting certain types of enclosures as discussed on page 11 of the LCAM v1.5.4 Documentation User manual & Overview, April 30, 2001. Please provide the rational for such a probability analysis. Also, provide the precise mathematical algorithm used to determine the likelihood that each enclosure is picked.

REPLY: There was no probability analysis. The choice of enclosure for each size was supplied by Verizon engineers as part of the Engineering Survey. The file "SurveyTool.xls" was provided in response to AT&T 14-33. The enclosure selections for the wire center are displayed on the "Remote Terminal" page.

The calculation of the total enclosure cost begins with the formula "INV_PM_CAB" (line 32 in the user interface) and continues through "RT_STRUC" (line 65).

d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Dinell Clark
Title: Staff Director

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-17 Please provide the precise mathematical algorithm used to select the sample of collocation jobs that are used in the collocation studies. As part of this answer also provide the criteria that were used to select the collocation jobs. Provide all workpapers, analysis, and studies that support the selection of the collocation jobs sample.

REPLY: The counts of initial jobs were determined separately from the counts of subsequent jobs.

For initial jobs, the algorithm used to determine the count of jobs was the following:

(1) Select all jobs in the universe of Metropolitan wire centers.
(2) For the universe of non-Metropolitan wire centers with one job, randomly select one job with probability = 50% and no job with probability 50%.
(3) For the universe of non-Metropolitan wire centers with two jobs, randomly select no job with probability = 25%, one job with probability = 50%, and 2 jobs with probability = 25%

For subsequent jobs, the algorithm used to determine the count of jobs was the following:

(1) For the universe of wire centers with subsequent jobs, select the count of jobs via a uniformly distributed random variable between zero and 40% of the number of jobs. This procedure generates a job count approximately equal to 20% of the universe of subsequent jobs.

REPLY: CC 10-17 Con't

Based on these counts, Verizon Real Estate developed the samples of initial and subsequent jobs. For example, if 4 jobs were to be selected out of 12 possible jobs, Verizon Real Estate randomly selected the 4 jobs that were included in the sample. In this process, all 12 jobs were given an equal chance of being included.

Please see the attachment to CC 4-5, which contains, by wire center, the counts of initial and subsequent jobs that were selected using this procedure.

VZ # 578

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-21 What CCS levels are assumed in LCAM?

REPLY: No CCS assumption is made in LCAM.

VZ # 582

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-22 Please identify exhaustively and completely all components of the unbundled loop cost model that are impacted if the CCS assumptions in LCAM are changed.

REPLY: Please see Verizon MA's response to Information Request CC 10-21.

VZ # 583

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-23 In VZ-MA's loop cost studies, what levels of CCS were assumed for the following:

a. Residential loops in each of the zones; and
b. Business loops in each of the zones.

REPLY: Please see Verizon MA's response to Information Request CC 10-21.

VZ # 584

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-24 Please provide all studies, workpapers and other analysis used to support the level of CCS assumed in VZ-MA's loop cost studies.

REPLY: Please see Verizon MA's response to Information Request CC 10-21.

VZ # 585

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Nancy Matt
Title: Manager - Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-29 What is the average concentration ratio assumed in VZ-MA's switching/SCIS studies?

REPLY: GR-303 lines are at 3:1 concentration. For analog lines, SCIS develops the concentration ratio for each office based on the input parameters. The concentration ratio for analog lines can be viewed in the SCIS User Input report for each office.

VZ # 590

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-31 In LCAM, when a building is served by more than 160 customers in the metropolitan zone, is the RT dedicated to building or does the model sometimes assume that other customers can also be served by that same RT? Please indicate how many instances the RT is shared with other customers.

REPLY: The model assumes that building remote terminals are dedicated to that building's customers only.

VZ # 592

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-33 Please provide all analysis, work papers and studies that support VZ-MA's contention that the average distribution length is ½ of the longest distribution length.

REPLY: The average distribution length calculation is based on the assumption that customers are evenly distributed along the length of the cable. There are no documents responsive to this request.

VZ # 594

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-34 For each state in VZ-MA's serving area, provide the average number of nodes per SONET ring for inter office facilities.

REPLY: There is only one state in Verizon MA's serving area. Refer to the Parameters TAB Line 27 for the average number of nodes per ring.

VZ # 595

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Nancy Matt
Title: Manager - Service Costs

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-35 Please indicate whether VZ-MA's IOF and fiber cost studies are based on VZ-MA's most current vendor contracts, including consideration of recent modifications of or updates to those contracts.

REPLY: For IOF equipment, the answer is yes. Please see the attachments to Verizon MA's response to Information Request ATT 2-42 for equipment prices.

For fiber, please refer to Verizon MA's response to Information Request ATT 14-27. Material price, placement labor, splice labor, and engineering labor cost associated with the placement of fiber cable is taken from the Engineering Construction Record Information System (ECRIS). Material price in the ECRIS database is the average disbursed material price over a thirteen-month rolling average.

VZ # 596